

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

UNITED STATES OF AMERICA

vs.

Case No. 8:03-CR-77-T-30TBM

GHASSAN ZAYED BALLUT

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**DEFENDANT GHASSAN BALLUT'S MOTION FOR LEAVE  
TO BRING ELECTRONIC DEVICES TO COURTROOM**

The Defendant, GHASSAN ZAYED BALLUT, by and through his undersigned counsel, pursuant to Local Rule 4.11(b), hereby requests this Honorable Court to permit the Defendant and his undersigned counsel to bring into the Court three electronic devices as described below during the trial of this cause and other related proceedings, and as grounds therefor states:

1. A substantial portion of the evidence provided by the parties in this cause was placed on CD-ROM disks to facilitate storage and retrieval of hundreds of pages of information.
2. All of the Defendant's motions and most of the Defendant's counsel's work product in this case has also been stored electronically, either to hard drive, CD-ROM's, or floppy disks over a period of more than two years.
3. The Defendant's undersigned counsel also requires a cellular telephone in the courthouse to facilitate communications with witnesses, his office, the paralegal assigned to this case, and various resources essential to the presentation of the defense.
4. The Defendant has also stored a variety of case-related information to his laptop computer which he needs to access during the trial, and the Defendant also wishes to participate in the review of information stored on CD-ROM including the transcripts and translations placed

into evidence by utilizing his own computer.

5. The electronic devices the Defendant and his counsel ask to bring into Court are:

- a. The defense counsel's Toshiba Satellite A25-S207 laptop computer, including a power cord and an external floppy disk drive;
- b. The defense counsel's Ericsson Model A1228LX cellular telephone, an older model which has no photographic or recording capabilities and which will be activated only for outgoing calls outside of the courtroom;
- c. The Defendant's HP Pavilion ZE4900 laptop, including the power cord.

6. These electronic devices will be brought into the courthouse with the understanding that the devices will be subject to inspection at any time by court security personnel.

#### **Memorandum of Law**

The judicial officer before whom a particular case or proceeding is pending may permit cellular telephones and computer equipment to be brought into the courthouse and courtroom. Local Rule 4.11(b). Such permission has already been given to other counsel in this case to facilitate access to records and materials during the trial of this cause.

Respectfully submitted,

/s Bruce G. Howie

Bruce G. Howie

Florida Bar No. 263230

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**Certificate of Service**

I HEREBY CERTIFY that on May 24, 2005, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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